

**ENTERED**

December 05, 2023

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
Chesapeake Exploration, L.L.C., <sup>1</sup>	§	Case No. 20-33239 (CML)
	§	
Reorganized Debtor.	§	(Formerly Jointly Administered under
	§	Lead Case Chesapeake Energy
		Corporation, 20-33233)

**STIPULATION AND AGREED ORDER  
REGARDING PROOF OF CLAIM NOS. 12957 AND 12985**

The above-captioned reorganized debtor (together with each of the reorganized debtors in the jointly-administered cases styled *Chesapeake Energy Corporation*, Case No. 20-33233, before the Effective Date of the Plan, the “Debtors,” and after the Effective Date of the Plan, the “Reorganized Debtors”) and Rodney and Dianna Mowry (the “Settlement Claimants”) hereby enter into this stipulation and agreed order (this “Stipulation and Agreed Order”) as follows<sup>2</sup>:

WHEREAS, on June 28, 2020 (the “Petition Date”), the Debtors, commenced chapter 11 cases by filing voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”);

<sup>1</sup> A complete list of each of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://dm.epiq11.com/chesapeake>. The location of Reorganized Debtor Chesapeake Energy Corporation’s principal place of business and the Reorganized Debtors’ service address in these chapter 11 cases is 6100 North Western Avenue, Oklahoma City, Oklahoma 73118.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the *Fifth Amended Joint Chapter 11 Plan of Reorganization of Chesapeake Energy Corporation and Its Debtor Affiliates* [Docket No. 2833] (the “Plan”).

WHEREAS, on October 30, 2020, the Settlement Claimants filed Proof of Claim Nos. 12957 and 12985 based on alleged breaches of multiple oil and gas leases, including purported unauthorized deduction of prepetition and postpetition expenses;

WHEREAS, on January 16, 2021, the Court entered the *Order Confirming Fifth Amended Joint Chapter 11 Plan of Reorganization of Chesapeake Energy Corporation and Its Debtor Affiliates* [Docket No. 2915] (the “Confirmation Order”), confirming, as modified therein, the Plan. On February 9, 2021, the Effective Date of the Plan occurred; and

WHEREAS, the Reorganized Debtors and the Settlement Claimants have consensually agreed, after good faith, arm’s-length negotiations, to resolve the Settlement Claimants’ Claims on the terms set forth in this Stipulation and Agreed Order.

**NOW, THEREFORE, IT IS STIPULATED AND AGREED** as follows:

1. The Settlement Claimants’ Claims are hereby treated as follows:

Claim No.	Filed Claim Amounts	Stipulated Treatment
Claim No. 12957	Unsecured: \$69,724.34 Admin: \$4,204.57 Total: \$73,928.91	To be treated in accordance with the Plan as:  Class 7 General Unsecured Claim: \$56,000 Admin: \$7,134 Total: \$63,134
Claim No. 12985	Unsecured: \$69,724.34 Admin: \$4,204.57 Total: \$73,928.91	Deemed withdrawn.

2. The Settlement Claimants, for themselves and all that may claim through them, release all claims and/or purported claims against Debtors and Reorganized Debtors that arose prior to the Effective Date of the Fifth Amended Joint Chapter 11 Plan of Reorganization of Chesapeake Energy Corporation and its Debtor Affiliates, including without limitation, those asserted in any Proof of Claim filed by or on behalf of the Settlement Claimants.

3. The Settlement Claimants must complete and return a Form W-9 and equity registration form to the Reorganized Debtors prior to receiving a distribution, if any.

4. Epiq Corporate Restructuring, LLC is hereby authorized and directed to update the Claims on the Official Claims Register to reflect the terms of this Stipulation and Agreed Order.

5. Nothing in this Stipulation and Agreed Order shall be interpreted to impair in any way the rights, claims or defenses reserved under the Plan or Confirmation Order with regard to or on behalf of the Debtors, the Reorganized Debtors, and the Settlement Claimants, except to the extent inconsistent with the terms of the Stipulation and Agreed Order.

6. The Court retains jurisdiction with respect to all matters arising from or related to the interpretation, implementation or enforcement of this Stipulation.

**IT IS SO ORDERED.**

Signed: December 05, 2023

  
\_\_\_\_\_  
Christopher Lopez  
United States Bankruptcy Judge

**STIPULATED AND AGREED TO THIS 29th DAY OF NOVEMBER, 2023:**

**SIGNATURE BLOCK FOR COUNSEL**

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/s/ J. Machir Stull

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*Co-Counsel to the Reorganized Debtors*

**Certificate of Service**

I certify that on November 29, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ J. Machir Stull

J. Machir Stull